

1 ROGER P. CROTEAU, ESQ.
Nevada Bar No. 4958
2 TIMOTHY E. RHODA, ESQ.
Nevada Bar No. 7878
3 ROGER P. CROTEAU & ASSOCIATES, LTD.
2810 W. Charleston Blvd., #67
4 Las Vegas, Nevada 89102
(702) 254-7775
5 (702) 228-7719 (facsimile)
croteaulaw@croteaulaw.com
6 *Attorney for Plaintiffs*

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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 IEHAB HAWATMEH, individually;)
13 YASMEEN HAWATMEH, individually;)
LAYTH HAWATMEH, individually; and)
14 IEHAB HAWATMEH, as Administrator of the)
ESTATE OF JOSEPH HAWATMEH,)
15 deceased,)
16)
Plaintiff,)
17 vs.)
18 CITY OF HENDERSON, et al. ,)
19 Defendants.)
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Case No. 2:22-cv-01786-APG-DJA

21 **STIPULATION TO EXTEND TIME TO RESPOND TO**
MOTION TO DISMISS (2ND Request)
22 **AND MOTION TO EXTEND DISCOVERY (1st Request)**

23 COMES NOW, Plaintiffs, IEHAB HAWATMEH; YASMEEN HAWATMEH; LAYTH
24 HAWATMEH; and IEHAB HAWATMEH, as Administrator of the ESTATE OF JOSEPH
25 HAWATMEH, and Defendants, CITY OF HENDERSON; CITY OF HENDERSON POLICE
26 DEPARTMENT; THEDRICK ANDRES; LIEUTENANT THOMAS CHIELLO; SERGEANT
27 JAIME SMITH fka SERGEANT JAIME CLEAR; SERGEANT SETH VAN BEVEREN;
28 OFFICER BRETT ANDERSON; OFFICER JESSE HEHN; OFFICER JESSE LUJAN;

1 OFFICER JAMES PENDLETON; OFFICER LUIS AMEZCUA; OFFICER PHILIP DUFFY;
2 OFFICER SETH PRICE, by and through their undersigned counsel, and hereby stipulate and
3 agree as follows:

- 4 1. The Defendants hereto filed a Motion for Dismissal Pursuant to FRCP 12(b)(6) on
5 December 13, 2022 [ECF #25]. A response to said Motion is presently due on or
6 about February 26, 2023.
- 7 2. The Defendants hereto filed a Motion to Stay Discovery on February 14, 2023
8 [ECF #30]. A response to said Motion is presently due on or about February 28,
9 2023.
- 10 3. Although substantial discovery has not yet taken place in this matter, Plaintiffs
11 have obtained thousands of pages of documents and a large number of audio and
12 video files which are relevant to the claims and defenses herein. Plaintiffs'
13 counsel requires additional time to review this evidence prior to responding to
14 Defendants' Motion to Dismiss. In addition, Plaintiff's counsel has had and
15 continues to have other work and family obligations that have reduced the time
16 available to respond to both of the subject motions.
- 17 4. Plaintiff's counsel has requested and shall be granted an additional extension of
18 time in which to respond to Defendants' Motion to Dismiss until March 20, 2023.

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1 5. Plaintiff's counsel has requested and shall be granted an extension of time in
2 which to respond to Defendants' Motion to Stay Discovery until March 15, 2023.

3 6. This Stipulation is made in good faith and not for purpose of delay.

4 Dated this 21st day of February, 2023.

5 ROGER P. CROTEAU &
6 ASSOCIATES, LTD.

MARQUIS & AURBACH

7
8 /s/ Timothy E. Rhoda
9 ROGER P. CROTEAU, ESQ.
10 Nevada Bar No. 4958
11 TIMOTHY E. RHODA, ESQ.
12 Nevada Bar No. 7878
13 2810 W. Charleston Blvd., #67
14 Las Vegas, Nevada 89102
15 (702) 254-7775
16 croteaulaw@croteaulaw.com
17 Attorney for Plaintiffs

18 /s/ Craig R. Anderson
19 CRAIG R. ANDERSON, ESQ.
20 Nevada Bar No. 6882
21 10001 Park Run Drive
22 Las Vegas, NV 89145
23 702-382-0711
24 canderson@maclaw.com
25 Attorney for Defendants

26 **IT IS SO ORDERED.**

27 By: 
28 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

Dated: February 23, 2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of February, 2023, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION TO DISMISS (2ND Request) AND MOTION TO EXTEND DISCOVERY (1st Request)** to the following parties:

Craig R. Anderson
Marquis & Aurbach
10001 Park Run Drive
Las Vegas, NV 89145
702-382-0711
702-382-5816 (fax)
canderson@maclaw.com
Attorney for Defendants

/s/ Timothy E. Rhoda
An employee or agent of ROGER P.
CROTEAU & ASSOCIATES, LTD.